

## REMARKS

The Office Action dated May 14, 2010 for this Application has been carefully considered. Claims 1-29 were previously pending. Dependent Claims 30 and 31 are new. Claims 2, 4-6, 12-13, 16, and 20-25 have been previously withdrawn. Claims 26 and 27 were previously cancelled without prejudice or disclaimer. Claims 3, 7-11, 14-15, 17-19, and 28-29 have been previously presented. Claims 26 and 27 were previously cancelled without prejudice or disclaimer.

Claim 1 is currently amended. Claim 1 includes clarifying amendments that were discussed with the Examiner in his kind interview of May 7, 2010, and additional clarifying amendments, as will be discussed, below. The Applicant thanks the Examiner for courtesies extended during this interview. Dependent Claims 30-31 are new. Dependent Claims 30 and 31 should not represent a significant burden upon the Examiner should the Examiner deem a search is warranted.

Support for amended Claim 1, and new dependent Claims 30-31 can be found at least in FIG. 14 of the present Application, wherein a set of input pre-conversion symbols are disjoint with a set of output post-conversion symbols such that no fixed sequences of pre-conversion symbols is equal to any sequence of post-conversion symbols. Also, support for generation of the input pre-conversion symbols as claimed can be found at least in FIG. 2 and in paragraphs [0081]-[0082] of the present Application.

Reconsideration and allowance are respectfully requested in light of the above Amendments and following remarks.

**I. Rejection of Claims 1, 3, 7-11, 14-15, 17-19, and 28-29 under 35**

**U.S.C. §112, second paragraph**

Claims 1, 3, 7-11, 14-15, 17-19, and 28-29 have been rejected under 35 U.S.C. §112, second paragraph as purportedly being indefinite for failing to particularly point and distinctly claim the subject matter which applicant regards as the invention. (*See* Office Action, page 2.)

The Applicant respectfully states that it was believed that the 35 U.S.C. §112, second paragraph rejections of these claims were addressed by proposed claim amendments discussed during the Examiner's kind interview of May 7, 2010. Examples of these amendments are: "at least one key of said plurality of keys also having at least one printable-symbol said pre-conversion symbol or said non-conversion symbol assigned to it" and "wherein m and n are integers,  $m \geq 1$ ,  $n \geq 1$ , and  $m \geq n$ ".

The Applicant respectfully states that the above amendments and traversals address the above rejections. The Applicant respectfully requests that the Examiner cite with more particularity any remaining individual 35 U.S.C. §112, second paragraphs so that they may be addressed by the Applicant with particularity. Alternatively, the Applicant respectfully requests that the rejections under 35 U.S.C. §112, second paragraph, be withdrawn, and that these claims be allowed to issue.

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## II. Rejection of Claims 1, 7-11, 18-19, and 26-27 under 35 U.S.C.

### §102(b)

Claims 1, 7-11, 14, 18-19, and 26-27 have been rejected under 35 U.S.C. §102(b) over U.S.

Patent No. 5,952,942 to Balakrishnan *et al.* ("Balakrishnan.")

Claim 1 as currently amended recites

3) a plurality of non-printable symbol-input-end symbols, each of which can be generated by a keystroke on any one of said plurality of keys, including at least one key of said plurality of keys also having at least one said pre-conversion symbol or said non-conversion symbol assigned to it, *wherein said input symbol-end-symbol generated by said at least one key is always generated if one of said at least one said pre-conversion symbols or said non-conversion symbols assigned to said at least one key is displayed in response to a same keystroke which generates said symbol-input-end symbol.* (Emphasis added.)

The Office Action has cited to Balakrishnan as providing "wherein said each symbol-input-end symbol is a non-printable symbol (col. 6, lines 43-50.)" (See Office Action, page 4.)

Col. 6, lines 43-50 of Balakrishnan recite:

If the entry at step 190 is neither of keys 18 and 19 then logically it must be another of the keys of keypad 16, representing a digit 0-9 and step 197 is reached. This entry is interpreted to be the start of a new word or character. In step 197 the end-of-word mode ends and a new word (or character) begins. The program proceeds to step 140 for processing of the new digit stream representing the new word or character.

However, previously in the same column of Balakrishnan, Balakrishnan recites:

If, following entry of one or more digits, and display of the candidate matches on display area 17, *key 19 is pressed, bearing the markings "#>>" the program proceeds to step 184. Step 184 represents the commencement of an end-of-word mode, terminating the entry of the current word and causing it to be displayed in text display area 15 followed by a space.* (See col. 6, lines 21-27; emphasis added.)

Note that, in Balakrishnan, the markings “#>>” are not displayed at Step 184, indeed no additional symbol is displayed at that step. In the invention of Claim 1, said input symbol-end symbol generated by said at least one key is always generated if one of said at least one said pre-conversion symbols or said non-conversion symbols assigned to said at least one key is displayed in response to a same keystroke which generates said symbol-input-end symbol.

However, Balakrishnan requires a “key 19” to get into an “end-of-word” mode. In the invention of Claim 1, however, there is no end-of-word mode, let alone a dedicated key to enter such mode.

Moreover, Claim 1 as currently amended claims: *“wherein said set of pre-conversion symbols is disjoint from said set said of post-conversion symbols such that no sequence of pre-conversion symbols is equal to any sequence of post conversion symbols.”* For example, in FIG. 14 of the present Application, the input symbols are Roman letters or numbers, and the output is Chinese ideographs. However, in the cited sections of Balakrishnan, the Applicant has not found *“wherein said set of said pre-conversion symbols is disjoint from said set said of said post-conversion symbols such that no sequence of pre-conversion symbols is equal to any sequence of post conversion symbols.”*

The Office Action attempts to read the present invention of Claim 1 onto Balakrishnan by equating (sequences of) pre-conversion symbols and (sequences of) post-conversion symbols, writing, “such that at least one fixed sequence of keystrokes (2255 (col. 4, lines 19-21)) corresponds to more than one sequence of pre-conversion symbols (BALK BALL CALK CALL (col. 5, lines 3-5)), each of said post-conversion symbols being set in a correspondence to a pre-conversion symbol (e.g. pre-conversion symbols CALL correspond to post-conversion symbols

CALL.)” (See Office Action, page 4). This claim amendment clarifies that no such equation of pre- and post-conversion symbols, or sequences thereof, is possible.

Indeed, and in stark contrast, inputting English words with the invention of Balakrishnan explicitly requires pre- and post-conversion symbols to be identical, to the extent that “conversion” occurs in entering English with the invention of Balakrishnan.

In light of the foregoing Amendments and remarks, the Applicant hereby respectfully states that a *prima facie* 35 U.S.C. §102(b) rejection of independent Claim 1 is not sustained, nor has a rejection of dependent Claims 7-11, 14, 18-19, and 26-27, which depend upon Claim 1. Accordingly, the Applicant respectfully requests that the rejection of dependent Claims 7-11, and 14, 18-19, and 26-27 under 35 U.S.C. §102(b) be withdrawn, and these claims be allowed to issue.

### **III. Rejection of Claims 8-9, and 14 under 35 U.S.C. §103(a)**

Claims 8-9 and 14 have been rejected under 35 U.S.C. §103(a) over Balakrishnan. Claims 8, 9 and 14 also depend upon Claim 1, which should be deemed in condition for allowance, as discussed above. Therefore, Claims 8-9 and 14 should also be deemed in condition for allowance. Accordingly, the Applicant respectfully requests that the rejection of dependent Claims 8, 9, and 14 under 35 U.S.C. §103(a) be withdrawn, and these claims be allowed to issue.

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## CONCLUSION

The Applicant has now made an earnest attempt to place this Application in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, the Applicant respectfully requests full allowance of Claims 1, 3, 7-11, 14-15, 17-19, and 28-31. Please charge one month's extension fee for a small entity to USPTO Deposit Account 501758.

Should the Examiner deem that any further amendment is desirable to place this Application in condition for allowance, the Examiner is invited to telephone the undersigned at the number listed below.

Respectfully submitted,

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